

# **Exhibit 23**

**AFFIDAVIT and DECLARATION OF Elizabeth Walters**

Dr. Elizabeth Walters, being duly sworn, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of 509 General Knox Rd, King of Prussia, in Upper Merion Township, Montgomery County, Pennsylvania.
2. I voted in the 2016 general election by absentee ballot in my precinct, Belmont-4.
3. I work as a Lecturer at Liverpool Hope University, UK.
4. When voting in the November 8, 2016 election I encountered the following problems:
  - On Wednesday, the 21st of September, 2016 I mailed an FPCA requesting an absentee ballot from Liverpool, United Kingdom.
  - On Friday, the 21st of October, 2016 at approximately 4:45pm I telephoned Montgomery County Voter Services enquiring about the status of my request for an absentee ballot, as I had not received any return communication. I was told that my FPCA request was not found in the office and I was advised to send another FPCA form via email.
  - On Sunday, the 23rd of October, I emailed an FPCA form requesting an absentee ballot. My email was not acknowledged.
  - On Sunday, the 30<sup>th</sup> of October, I sent an email explaining all the difficulties I had encountered receiving my absentee ballot. I informed the office that I was very concerned that I would be denied my constitutional right to vote. I had contacted Montgomery County Voting Services by mail, telephone and email for over a


month even though I had voted by absentee ballot twice before in Montgomery County.

- On Monday, the 31<sup>st</sup> of October I tried phoning Montgomery County Voter Services twice, but the phone was busy. I could not get through.
- On Tuesday, 1<sup>st</sup> of November I received an email about my “absentee application on 11/01/2016. This application has been processed and has been Approved.”
- On Wednesday, the 2<sup>nd</sup> of November I received an email that stated my electronic ballot was ready. I discovered to my disappointment, however, that this ballot only allowed a “Federal” Ballot: the ballot only included the choice of President, Senator and Member of Congress. Hence, I was unable to exercise my right to cast a ballot in the state office races (Attorney General, Treasurer etc.). In contrast, my husband, who applied for an absentee ballot in person, had a complete absentee ballot.
- On approximately the 2<sup>nd</sup> or 3<sup>rd</sup> of November I phoned Montgomery County Voter Services and left a message on their machine asking why I did not receive a state ballot. I left my name and email address twice on this message and asked them to contact me. My telephone message was never returned.

I am curious to know how many ballots cast in Pennsylvania were Federal-only ballots. If this processing snafu were common, it seems that it could potentially disenfranchise a significant number of voters and skew the results. Similarly, I am curious to know if other people encountered the unreasonable difficulties and obstacles that I faced in trying to exercise my constitutional right to vote, which also could affect final results.

5. I am concerned that my vote and the votes of my fellow citizens were not counted accurately in the election, and would like a manual recount of every paper ballot and a forensic examination of the electronic voting systems in Pennsylvania to make the vote had integrity and every vote counted.

Dated: December 5, 2016

  
Elizabeth Walters